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May 10, 2018

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Joshua Sosa, 17 Cr. 580 (NRB)

Dear Judge Buchwald:

I represent Joshua Sosa in the above-captioned matter. I write, with the Government's consent, to request a one-week extension of time regarding the motion schedule in this matter.

At the April 11, 2018 status conference, we informed the Court that we anticipated filing two motions: (1) a motion to compel the production of *Brady* material relating to the identities of two eyewitnesses to the alleged shooting; and (2) a motion to suppress the shooting victim's identification of Mr. Sosa in the hospital on the day of the shooting. At the April 11 status conference, the Court set a motion schedule, whereby defense motions were due on May 11, 2018, the Government's opposition was due on June 11, 2018, and the defense's reply was due on June 25, 2018.

We seek this one-week extension for two reasons. First, the Government produced additional discovery this week relating to the identification by the victim of Mr. Sosa. Accordingly, the defense needs additional time to assess whether this newly produced information impacts the filing of our motion to suppress. Second, with regards to our planned motion to compel the production of *Brady* material relating to the identities of two eyewitnesses, the Government initiated discussions with the defense this week in an effort to accommodate our request such that motion practice might be avoided. We are still engaged in those discussions in an effort to resolve the issue without Court intervention.

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Given these developments, and the fact that AUSA Lauren Schorr is currently on trial, we request a one-week extension of the motion schedule such that the defense would file motions by May 18, 2018, the Government opposition to be due on June 18, 2018, and the defense reply due on July 2, 2018. This is the parties' first request for a time extension.

Respectfully submitted,

/s/

Rita M. Glavin

cc: AUSA Lauren Schorr, Esq. (by email)